

## REMARKS

### **I. Introduction**

Claims 11, 13-21 and 23-37 are pending in the present application. Reconsideration of the present application is respectfully requested.

### **II. Rejection Of Claims 11, 13-21 and 23-37 Under 35 U.S.C. § 102**

Claims 11, 13-21 and 23-37 were rejected under 35 U.S.C. § 102(e) as anticipated by U. S. Patent No. 6,301,513 to Divon et al. ("Divon et al."). Applicants respectfully submit that Divon et al. does not anticipate claims 11, 13-21 and 23-37 for at least the following reasons.

Claims 21 and 28 recite a record/read unit and a voice digitization module as part of an automobile radio device, and a chip card removably received by the record/read unit. Similarly, claims 11 and 31, as presented, recite digitizing a message via a voice digitization module of an automobile radio device, and storing the digitized message in a memory module of a chip card removably received by a record/read unit of the automobile radio device. In this regard, it is clear that the voice digitization module of the present invention is integrated with the automobile radio device and not a component of the chip card (i.e., the chip card is separable from the voice digitization module). Consequently, the chip card of the present invention may be a universal storage card for use in a plurality of applications, and only a single voice digitizing module is required, even with the use of a multiple chip card types. In Divon et. al by contrast, each storage cassette is arranged with an individualized digital vocalizer so that the vocalizer is not a component of the car radio, but instead is integrated with the storage cassette. Thus, not only is the audio system according to Divon et al. much more complex and expensive, its arrangement requires that the digitizing module be integrated with the storage medium and not a part of the car radio device. Accordingly, the audio system of Divon et al. does not disclose, or even suggest, a voice digitization module as part of an automobile radio device, or a chip card separable from the voice digitization module, as recited in claims 11, 21, 28 and 31.

For at least the above-mentioned reasons, Divon et al. do not anticipate or render obvious claims 11, 21, 28, or 31. As for claims 13-20, which depend from claim 11 and therefore include all of the features of claim 11, claims 23-27 and 34, which depend from claim 21 and therefore include all of the features of claim 21, claims 29-30, which depend from claim 30 and therefore include all of the features of claim 30, and claims 32-33, which

depend from claim 31 and therefore include all of the features of claim 31, it is respectfully submitted that these claims are not anticipated or rendered obvious by Divon et al. for at least the reasons given above in support of the patentability of claims 11, 21, 28, and 31.

In view of at least the foregoing, it is respectfully requested that the rejection of claims 11, 13-21 and 23-34 under 35 U.S.C. § 102(b) over Divon et al. be withdrawn.

### **III. Rejection Of Claim 20 Under 35 U.S.C. § 103**

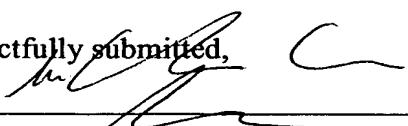
Claim 20 was rejected under 35 U.S.C. § 103(a) as unpatentable over Divon et al. Applicants respectfully submit that claim 20 is patentable over Divon et al. for at least the following reasons.

Claim 20 depends from claim 11, which as explained above includes several features not disclosed, or even suggested, by Divon et al, such digitizing a message via a voice digitization module of an automobile radio device, and storing the digitized message in a memory module of a chip card removably received by a record/read unit of the automobile radio device, as recited in claim 11. Therefore, Divon et al. does not render obvious claim 11, or claim 20. Accordingly, it is respectfully requested that this rejection of claim 20 under 35 U.S.C. § 103(a) be withdrawn.

### **IV. Conclusion**

In light of the foregoing, it is respectfully submitted that all pending claims are in condition for allowance. Prompt reconsideration and allowance of the present application are therefore earnestly solicited.

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Respectfully submitted,  
By: 

Richard L. Mayer

(Reg. No. 22,490)

KENYON & KENYON  
One Broadway  
New York, New York 10004  
(212) 425-7200